

John A. Sundahl, WSB# 5-1244
 Patrick M. Brady, WSB# 7-5494
 Jane M. France, WSB #7-4828
 Sundahl, Powers, Kapp & Martin, L.L.C.
 2020 Carey Avenue, Ste. 301
 P.O. Box 328
 Cheyenne, WY 82003-0328
 (307)632-6421
 (307)632-7216 facsimile
jsundahl@spkm.org
pbrady@spkm.org
jfrance@spkm.org
 Attorneys for Defendant Walmart Inc.

**UNITED STATES DISTRICT COURT
 DISTRICT OF WYOMING**

STEPHANIE WADSWORTH INDIVIDUALLY)	
AND AS PARENT AND LEGAL GUARDIAN)	
OF)	
W.W., K.W., G.W., AND L.W., MINOR)	
CHILDREN AND MATTHEW WADSWORTH)	
Plaintiffs,)	
vs.)	Civil No. 2:23-cv-00118-NDF
WALMART, INC. AND)	
JETSON ELECTRIC BIKES, LLC.)	
Defendants.)	

**DEFENDANT WALMART, INC.'S MOTION TO EXTEND TIME TO RESPOND TO
 COMPLAINT**

COMES NOW, Defendant, Walmart, Inc., by and through its undersigned counsel, and hereby moves this Court for an extension of time to file an answer or other response to the Plaintiffs' Complaint pursuant to Local Rule 6.1(b). An answer to the Complaint is due on August 2, 2023. Defendant's attorney has only just recently become aware that the Complaint was served and requires additional time to respond to the 358-paragraph Complaint. Defendant requests an additional 14 days to answer or otherwise respond to the Complaint, making its response due on August 16, 2023. Defendant has conferred with Plaintiff's counsel Mike Morgan who does not oppose the extension, see attached email.

Dated this 1st day of August 2023



John A. Sundahl, WSB# 5-1244
Patrick M. Brady, WSB# 7-5494
Jane M. France, WSB #7-4828
Sundahl, Powers, Kapp & Martin, L.L.C.
2020 Carey Avenue, Ste. 301
P.O. Box 328
Cheyenne, WY 82003-0328
(307)632-6421
(307)632-7216 facsimile
jsundahl@spkm.org
pbrady@spkm.org
jfrance@spkm.org
Attorneys for Defendant Walmart Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served this 1st day of August 2023, as follows:

Taly Goody, ESQ.
Goody Law Group
58 Malaga Cove Plaza
Palos Verdes Estates, Ca 90274
Taly@GoodyLawGroup.com

☐ U.S. Mail
☐ Electronically
☒ E-File

T. Michael Morgan, Esq.*
Morgan & Morgan, P.A.
20 N Orange Ave., Suite 1600
Orlando, Fl 32801
mmorgan@forthepeople.com
Counsel for Plaintiffs
**Wyoming Pro Hac Vice Pending*

☐ U.S. Mail
☐ Electronically
☒ E-Filed



John A. Sundahl / Patrick M. Brady